

HEDMAN, ASA & GILMAN REPORTING - 752-5751/752-3334  
P.O. BOX 394 -- KALISPELL, MONTANA

1 Q What's her name?

2 A Opal Mongon.

3 Q When did she die?

4 A '86, '87.

5 Q How old was your father when he passed

6 away?

7 A 59.

8 Q How old was your mother?

9 A 74 or 76.

10 Q Did your mother ever work outside the

11 home?

12 A Not when we were growing up. She did work

13 after my dad passed away. She worked as a waitress

14 and a dishwasher.

15 Q Your parents brought you and your older

16 brothers and sister out to Libby in about 1945?

17 A '44.

18 Q What did they do for a living?

19 A What did they do?

20 Q Yeah.

21 A My dad worked for awhile at the box

22 factory at the mill. He didn't work there very

23 long. I only know this just from hearing them talk

24 when I was growing up. And then he went to work for

25 Zonolite.

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1 Q What did he do at the box factory?

2 A I don't know.

3 Q What did he do at Zonolite?

4 A That I know of, I know he did some welding  
5 and was a mechanic, but I don't know.

6 Q Did he smoke?

7 A He smoked cigarettes for awhile, and then  
8 he went to cigars, smoked a few cigars.

9 Q As long as you can remember the image of  
10 your father, did you know him to smoke?

11 A Yes, but not very much. I remember him  
12 smoking, but he never smoked very much. Like at  
13 night he might have a cigar.

14 Q Do you remember him coming home when you  
15 were a child?

16 A Yes.

17 Q Okay. And there's been some reference to  
18 that in the legal papers that were filed for you on  
19 this case. Can you tell me about your recollections  
20 of that?

21 A My father?

22 Q Yeah.

23 A I remember us kids slapping his clothes  
24 and leaving handprints on him from the dust.

25 Q How old were you then?

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1           A   Probably about five or six because we used  
2           to climb all over our dad.

3           Q   And who is "We"?

4           A   My sisters and I. Usually, most of the  
5           time it was my younger sister and I.

6           Q   You and Donna?

7           A   Yeah.

8           Q   Where was Betty at that time?

9           A   Well, she was older. I don't -- She just  
10          didn't climb around on Dad like we did.

11          Q   So it was mostly you and Donna? Is that  
12          what you're saying?

13          A   Yeah. We were Dad's girls.

14          Q   How old would you have been about that  
15          time?

16          A   Just -- I don't know. I was just young.  
17          I can remember him back before I ever went to  
18          school. I can remember him giving me a bath in the  
19          sink and Donna a bath in the sink. We never -- We  
20          had running water in the kitchen. He'd set us up in  
21          the sink.

22          Q   That's out here in Libby?

23          A   Uh-huh.

24          Q   Is that a, Yes?

25          A   Yes.

1 Q So you'd have been maybe five years old?

2 A Yeah. Four, five, six.

3 Q Did you start school about age six?

4 A Yeah.

5 Q So you have a memory of you and Donna  
6 slapping your dad when he'd come home from work and  
7 leaving your handprints on his dusty clothing? Is  
8 that what you're saying?

9 A Yes.

10 Q And it's your understanding, at least,  
11 that he was working at the Zonolite mine at that  
12 point in time?

13 A Yes, he was.

14 Q But you have no personal knowledge or  
15 information about what he was doing at Zonolite at  
16 that time?

17 A I don't -- I was just a little kid.

18 Q And there are no records and no way to  
19 even begin to try and piece together what he would  
20 have been doing at that time?

21 A Unless you can find somebody that worked  
22 with him.

23 Q You haven't found anyone, have you?

24 A My husband worked with him for awhile.

25 Q In 1948, '49?

1 would you?

2 A No. I was too young.

3 Q Sure. How many years did this pattern  
4 continue that you can recall where your father would  
5 come home dusty?

6 A All the time until he passed away.

7 Q Did he work --

8 A He was always coming home dusty.

9 Q Did he work at the mine until 1961?

10 A Yes.

11 Q And he was a mechanic throughout that  
12 whole time, pretty much?

13 A And a welder, and I don't know what else  
14 he done.

15 Q So your husband, Bud, was he a mechanic  
16 and a welder too?

17 A No.

18 Q What area did your husband work in? I'll  
19 have to ask him?

20 A I can tell you that he blasted. He worked  
21 with dynamite. I know because he used to dream  
22 about it.

23 Q What I'm trying to get a little sense of  
24 is -- I'm of the understanding that certain parts of  
25 the mine, depending where you are at on the

1 Q Near your parents?

2 A No.

3 Q Did you have much daily contact with your  
4 parents after you and Bud got married?

5 A I went to my parents' every day. I walked  
6 to my parents' every day.

7 Q Just to see them?

8 A Yeah. I was still a kid.

9 Q Okay. And Bud was working up in the  
10 logging --

11 A He worked for J. Neils Lumber Company.

12 Q Okay. Is there anything else you can tell  
13 me that you recall about growing up at your parents'  
14 home as far as being around your father and anything  
15 about his work and what he brought home from work?

16 A He used to bring us home all kinds of  
17 stuff to play with.

18 Q Before you were married?

19 A Yes. He brought us -- He brought us home  
20 Zonolite to play with.

21 Q What do you remember about that?

22 A I remember popping it on the wood stove.  
23 I remember playing with it in the driveway. We used  
24 to call it our gold. When sun would hit it just  
25 right, it sparkled like gold. We used to call it

1 gold. We had it in the driveway.

2 Q Who is "We"?

3 A My dad had it in our driveway.

4 Q I mean, who is "We" that used to play with  
5 it?

6 A All of us kids used to play with it.

7 Q Anything else?

8 A We had it in the garden.

9 Q This gold-colored material?

10 A Uh-huh. Zonolite. Dad brought it home in  
11 bags, put it around.

12 Q Anything else that you remember?

13 A No. I don't remember nothing else.

14 Q Okay. Did you use it for any insulation  
15 or anything else in the house anywhere?

16 A It was in our ceiling, our roof. I don't  
17 know if it was in the walls, but I know it was in  
18 the ceiling.

19 Q How did you know that?

20 A Because my husband and my dad put it in  
21 the ceiling.

22 Q After you were married?

23 A No. They did it before I was married in  
24 1954.

25 Q How did you get to know your husband?



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1 gold, and we'd bury it in jars. There's probably  
2 still jars of it buried around that place.

3 Q Anything else that you can remember about  
4 that growing up?

5 A I don't know what.

6 Q Did you have anything to do with cleaning  
7 your father's clothes or anything?

8 A We was always around when Mom done the  
9 laundry, but I was just a little kid. I remember  
10 playing in the dirty clothes. When she'd spread  
11 them out on the floor to launder them, she used to  
12 yell at us, and she had an old wringer wash machine,  
13 which she used it right in the kitchen. Until I got  
14 older, I didn't help her. When we got older, then,  
15 we used to help her. As a little kid, you didn't  
16 want to be --- She didn't allow us around the wringer  
17 washing machine.

18 Q Sure. I understand that you claim and  
19 believe you have asbestos lung disease. Is that  
20 accurate?

21 A Yes.

22 MR. SULLIVAN: Specifically, it's  
23 asbestosis.

24 BY MR. HOISTAD:

25 Q A disease related to exposure to asbestos;

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1 Q And were you smoking about the same?

2 A No.

3 Q What were you smoking?

4 A I smoked less than a pack a day.

5 Q Three-fourths?

6 A Yeah. Or less.

7 Q And that would vary from day to day, I  
8 suppose, depending on what you were doing?

9 A I worked, and I couldn't smoke.

10 Q We have a summary of where you worked, but  
11 before we get into those places and times, I'd like  
12 to know about your husband's work a little bit.  
13 There was a time when he worked at the Grace mine,  
14 as I understand it, or maybe it was Zonolite then.  
15 I'm not sure.

16 A Yes.

17 Q Which was it? Do you recall?

18 A Zonolite.

19 Q And he was a blaster, you told me, I  
20 think?

21 A Yes.

22 Q Is that what he did his whole time that he  
23 worked there?

24 A No.

25 Q Where else did he work?

1           A     He worked all over that mine. He worked  
2           on the dump. He drove a truck. He worked in the  
3           blasting. He worked in the cleaning.

4           Q     And that was for about three years?

5           A     Yeah.

6           Q     Two years? 1959 until 1961?

7           A     Yeah.

8           Q     Now, it's my understanding that you claim  
9           that he would bring home asbestos fibers on his  
10          clothing that you were exposed to? Is that what  
11          you're claiming?

12          A     Yes.

13          Q     And can you tell me what you remember  
14          about that?

15          A     Him coming home dusty?

16          Q     Yeah.

17          A     Yeah. He'd come home really white, and  
18          his clothes would be full of it.

19          Q     And would your children climb on him like  
20          you did with your father?

21          A     If they got me off his lap first. Yes,  
22          our children were climbing on him too.

23          Q     And was there anything else that you can  
24          remember about Bud coming home from the mine as far  
25          as being dusty or whatever?

1           A     Just dust, lots of dust. Of course, we  
2     was -- Back in them days they wore cuffs, so he was  
3     really full of it, cuffs full of it.

4           Q     Now, as you sit here today, you wouldn't  
5     have any idea what was in that dust, would you?

6           A     No.

7           Q     Okay. I mean, you wouldn't know if there  
8     was asbestos in it or not, would you?

9           A     No. I didn't know.

10          Q     Other than yourself do you know of anybody  
11     in your family who has ever had asbestosis?

12          A     No.

13          Q     Bud doesn't have it to your knowledge?

14          A     To my knowledge, no.

15          Q     And your father died of a heart attack, I  
16     think you said?

17          A     As far as I know.

18          Q     Other than the two years that Bud worked  
19     at the mine, where else did he work?

20          A     He was a painter, a house painter.

21          Q     So that's maybe where Clinton gets some of  
22     his talent?

23          A     Maybe.

24          Q     How long was Bud in the painting business?

25          A     He started working for his dad when he was

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1                   You know, I'm freezing. I don't know, but  
2                   I'm really cold.

3                   MR. SULLIVAN: Do you want to take a  
4                   moment and just put your jacket on?

5                   THE WITNESS: I'll put my jacket on.

6                   BY MR. HOISTAD:

7                   Q     We're getting nearly done. Do you want to  
8                   take another break for a minute?

9                   A     If you're almost done, let's finish.

10                  Q     I'm not almost, but it's not going to be  
11                  too much longer.

12                  MR. SULLIVAN: Let's take a two-  
13                  minute break.

14                  (Brief recess.)

15                  (The reporter then read back the  
16                  requested material.)

17                  BY MR. HOISTAD:

18                  Q     So last year, 1997, do I understand that  
19                  there was a continuing increase in the amount of  
20                  your coughing to the point where by July it got so  
21                  bad you felt you had to go to a doctor? Is that  
22                  what you're saying?

23                  A     Yeah.

24                  Q     Because I had the impression you woke up  
25                  sick one morning in July and went to the doctor.

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1           A    No. No. No. The cough just kept getting  
2           progressive until it really got bad.

3           Q    How many years have you been coughing?

4           A    Coughing? Just coughing once in awhile?

5           Q    Coughing more than once in awhile.

6           A    Just the last year is when I really got  
7           bad coughing.

8           Q    Years or year?

9           A    Last year, in '97.

10          Q    Starting about when?

11          A    Boy, I don't know, but I -- I'm trying to  
12          think. I don't really know when I started coughing  
13          really bad. I could probably go over and ask the  
14          women at the store. They'd probably tell me more.  
15          I really don't know when it was. I just started  
16          coughing a lot.

17          Q    Okay. This was a problem that was  
18          apparent to others who worked around you at the dime  
19          store?

20          A    Yes.

21          Q    And it got continually worse until you  
22          finally got relief with medication from  
23          Dr. Whitehouse?

24          A    Yes.

25          Q    Is that accurate?

1 A Yes.

2 Q And did he tell you what your problem was?

3 A He told me the only thing he could find  
4 wrong with me was that I had asbestosis.

5 Q And do you still have high blood pressure?

6 A Yeah. He didn't check that, I don't  
7 think, but, yeah, I still have high blood pressure.

8 Q Did he tell you that he thought you should  
9 quit smoking?

10 A I'd already quit.

11 Q When had you quit?

12 A I quit the day I found -- that I couldn't  
13 breathe. The day I couldn't breathe, that was it.  
14 All the ashtrays are out of my house. In July.  
15 About the 17th of July.

16 Q Are you done?

17 A Yeah.

18 Q Okay. So there did come a time,  
19 specifically July 17, that was a day that you  
20 remember as being the worst; is that accurate?

21 A Well, I just woke up and couldn't breathe,  
22 and it scared the snot out of me, but that's not the  
23 first time that had happened.

24 Q You'd had that happen before?

25 A Yes.

1 Q When?

2 A A few days before that it happened to me,  
3 and I couldn't breathe.

4 Q Did you go to a physician at that time?

5 A That's when I was doctoring and taking the  
6 stupid medication that they give me thinking I had  
7 pneumonia, and the medication wasn't helping.

8 Q That was earlier in July?

9 A Yeah.

10 Q Were you smoking then?

11 A Very little. I couldn't -- You can't  
12 cough and smoke like that, I tell you.

13 Q You were --

14 A I flat quit the one day. I just -- I  
15 said, This is it. No more.

16 Q On July 17th?

17 A I think it was -- I think it was the  
18 17th. It was either that week or the next week, and  
19 I just quit. He took me to the doctor. We went  
20 home. All the ashtrays was taken out of the house,  
21 No Smoking, put up, and that was it. There's no  
22 smoking in the house, no ashtrays, nothing.

23 Q What had gone on in your conversation with  
24 the doctors or in your mind that caused you to take  
25 this drastic action with regard to the ashtrays and



1 what I assume you go to Dr. Cox for --

2 A Yes, it is.

3 Q -- have you had other kinds of discomfort?

4 A No. Just my chest.

5 Q How is that? Is it pretty much the same

6 as it was when you were first over to see

7 Dr. Whitehouse last summer?

8 A No. It's getting worse.

9 Q In what way?

10 A I hurt more.

11 Q And can you tell me anything else about

12 it? Is it something that's better in the evening

13 than in the morning, or do certain things make it

14 worse or better? Anything you can tell me?

15 A Bending over really hurts. I can't stand

16 for very long. I mean, I just can't do a lot. It

17 just hurts. My chest hurts. Across my back hurts.

18 Under my ribs hurt. My diaphragm hurts.

19 Q Okay. Is there anything that relieves the

20 discomfort?

21 A If I am not sitting too long. If I lay

22 back, a lot of times that will relieve it.

23 Q Like in a recliner chair?

24 A Yeah. It's a hard thing to explain.

25 Q Any foods or medications or anything that

1 you can associate with making the pain better or  
2 worse?

3 A It doesn't make the pain better, the  
4 medications I'm on, but it does help my breathing.  
5 I have three of these. I take two in the morning.  
6 This one I can take whenever I need to. It doesn't  
7 matter how often I take this one, I guess.

8 Q You're referring to your inhalers?

9 A I take it whenever I need it. Yeah.

10 Q How about sleeping? How does that go for  
11 you?

12 A Hey, one night this year I had five hours  
13 solid sleep. That was it. Otherwise than that, no,  
14 I don't sleep. I don't sleep. I have to sleep in  
15 my recliner a lot because -- I don't know what it  
16 is. I can't lay on my back in a bed because of my  
17 back. I just can't do it, but in my recliner I can  
18 put my feet up, you know, and then I recline, and I  
19 sleep with my arms right straight down, which I  
20 suppose sounds silly, but it gives me more length, I  
21 guess you could say. Does that make sense? I know  
22 that sounds weird, but if I'm -- See, right now I'm  
23 sitting normal. Okay.

24 MR. SULLIVAN: When you say "More  
25 length," are you talking about more lung -- It's

1 easier to breathe --

2 THE WITNESS: Yeah.

3 MR. SULLIVAN: -- or it helps your  
4 back?

5 THE WITNESS: It's easier to  
6 breathe. It's like I need more space. It's like I  
7 need stretched. I know that sounds silly, but how  
8 do you describe something like that?

9 BY MR. HOISTAD:

10 Q Have you been having problems because of  
11 your back sleeping in a normal reclined or prone  
12 position in bed for many years?

13 A No. It's not because of my back that I  
14 sleep in the recliner. To lay flat -- I can't lay  
15 flat.

16 Q And you haven't able to do that --

17 A For a lot of years, no.

18 Q Let's say in 1985, after you folks had  
19 moved back to Libby, were you finding it was a lot  
20 easier for you to rest at night if you were in a  
21 semireclined --

22 A No. In '85 I slept in my bed.

23 Q When did you quit sleeping in your bed?

24 A This year. Last year.

25 Q In 1997?

1           A     1997, early in 1997. About in April or  
2     May or March, somewhere in there is when I started  
3     sleeping in my recliner.

4           Q     Prior to that time --

5           A     I slept in bed, and I sleep on my side  
6     when I'm in bed.

7           Q     Do you sleep in bed at all?

8           A     A lot of times I start out there.  
9     Sometimes if I'm really bad I don't even start out  
10    in bed. I just tell my daughter, If you're watching  
11    TV and I go to sleep, just turn the lights off, and  
12    leave me here, so she does. ,

13          Q     Your daughter --

14          A     Vicky.

15          Q     -- Vicky, is living with you, and her  
16    children are all grown, I think you said?

17          A     All grown. She's a grandmother.

18          Q     How do you and Vicky spend your time?

19          A     How do we spend -- Just -- Most of the  
20    time I'm sitting in my recliner. She said I'm  
21    really good at holding it down. I have a hard time  
22    sweeping because I can't take the dust.

23          Q     Hard time what?

24          A     Sweeping. I run out of air. I can't  
25    finish doing the dishes because I run out of air. I

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1 don't know. That's the only thing I say is just,  
2 like, I run out of air. I can't breathe. What is  
3 really silly is, I can go take a shower, get out of  
4 that shower and start coughing, and by the time I'm  
5 dressed, I can barely make it back the ten feet to  
6 the kitchen to sit down.

7 Q Okay.

8 A And then, if I want to do anything, I've  
9 got to sit there for a long time before I can get up  
10 to do anything because I just don't have -- I just  
11 can't.

12 Q So it's you and your daughter and your  
13 husband and your son, Clinton, who live in your  
14 household at the present time; is that accurate?

15 A And Vicky's husband.

16 Q And Vicky's husband --

17 A Bruce.

18 Q -- Bruce when he's in town?

19 A Yeah. Because he does work. He works in  
20 Moyie. He drives back and forth.

21 Q And Clinton hasn't been working until  
22 recently when he started his sign painting business;  
23 is that true?

24 A Uh-huh.

25 Q So how do you folks typically, you know,